

## REMARKS

Reconsideration and allowance of the subject application are respectfully solicited.

Claims 1 through 23 are pending, with Claims 1, 12, 17, 18, and 23 being independent. Claims 1 through 23 have been amended.

Claims 1 through 23 were variously rejected under 35 U.S.C. § 103 over U.S. Patent No. 6,453,052 B1 (Kurokawa, et al.) in view of U.S. Patent No. 6,608,650 B1 (Torres, et al.), or Kurokawa, et al. and Torres, et al. in view of (a) U.S. Patent No. 6,205,231 (Isadore-Barreca, et al.), (b) U.S. Patent No. 6,754,389 B1 (Dimitrova, et al.), (c) Platt (“AutoAlbum”), and (d) U.S. Patent No. 6,118,887 (Cosatto, et al.). All rejections are respectfully traversed.

Claims 1, 17, 18, and 23 recite, inter alia, choosing, from the set of images, an indicative image in which the specified object is present, in combination with tagging the images in the set in which the part is found (by searching the set for the part dependent upon the color).

Claim 12 recites, inter alia, means for choosing, from the set of images, an indicative image in which the specified object is present, in combination with means for tagging the images in the set in which the part is found (by searching the set for the part dependent upon the color).

However, Applicant respectfully submits that none of Kurokawa, et al., Torres, et al., Isadore-Barreca, et al., Dimitrova, et al., AutoAlbum, and Cosatto, et al., even in the proposed combinations, assuming, arguendo, that the documents could be combined, discloses or suggests at least the above-discussed combinations of claimed features as recited, inter alia, in

Claims 1, 12, 17, 18, and 23. It is further respectfully submitted that there has been no showing of any indication of motivation in the cited documents that would lead one having ordinary skill in the art to arrive at such claimed features.

The dependent claims are also submitted to be patentable because they set forth additional aspects of the present invention and are dependent from independent claims discussed above. Therefore, separate and individual consideration of each dependent claim is respectfully requested.

Applicant submits that this application is in condition for allowance, and a Notice of Allowance is respectfully requested.

Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our address given below.

Respectfully submitted,



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